

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BOSTON EDISON COMPANY;
CAMBRIDGE ELECTRIC LIGHT COMPANY;
COMMONWEALTH ELECTRIC COMPANY;
NSTAR GAS COMPANY**

D.T.E. 04-2

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, and NSTAR Gas Company, its predecessors or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding. Use these instructions for all sets of discovery responses.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate **DATED** page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Companies" refers to Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, NSTAR Gas Company, and their predecessors. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-1-1 Please provide a copy of the workpapers, calculations, formulas, assumptions, and other supporting documentation used to prepare the Merger Savings Report. Please cross reference each response to the related table and line items in the Merger Savings Report. Please also provide workable electronic copies of all calculations on an EXCEL or LOTUS 123 formatted disc.
- AG-1-2 Please provide copies of each of the companies' Annual Returns to the Department for each of the years 1998 through 2003.
- AG-1-3 Please provide copies of all of the early retirement packages offered to NSTAR, Boston Edison and Commonwealth Energy employees.
- AG-1-4 Please provide copies of all of the memorandum, analysis, and studies done by, or for the Company regarding the expected cost and cost reduction as a result of the early retirement packages.
- AG-1-5 Please provide the Company's estimated merger savings by year assuming an annual inflation rate of 1.8 percent, rather than the 2.5 percent that the Company used in its calculations. Please also provide a copy of the workpapers, calculations, formulas, assumptions, and other supporting documentation used to prepare that estimate.
- AG-1-6 Please provide percent increase in the Gross Domestic Chain-Type Product Price Index for each of the years 1999, 2000, 2001, and 2002. Please also provide a copy of the workpapers, calculations, formulas, assumptions, and other supporting documentation used to prepare those calculations.

- AG-1-7 Please provide for each of the companies, the number of employees by functional area by month for each of the months of 1998 through 2002.
- AG-1-8 Referring to page 34 of the Merger Savings Report, please for each of the companies, the number of employees, by employee category (indicated as "L1" to "L11," etc.), by month for each of the months of 1998 through 2002.
- AG-1-9 Referring to page 6 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the 4.69 percent Escalation Rate for Corporate Employees
- AG-1-10 Referring to page 6 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the 4.69 percent Escalation Rate for Advertising.
- AG-1-11 Referring to page 6 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the 4.69 percent Escalation Rate for Professional Services.
- AG-1-12 Referring to page 6 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the 4.69 percent Escalation Rate for Contract Services.
- AG-1-13 Referring to Sections C1 through C14 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the actual salary associated with the actual reductions for each of the Savings Areas.
- AG-1-14 Referring to Sections C1 through C14 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the actual loading factors associated with the actual reductions for each of the Savings Areas.
- AG-1-15 Please provide copies of all contracts for services with former employees retired or terminated within the last four years.
- AG-1-16 Please provide the annual cost of temporary help services incurred by each of the companies in each of the years 1997 through 2003.
- AG-1-17 Please provide the number of part time employees for each of the companies for each of the years 1997 through 2003.
- AG-1-18 Please indicate whether the tables and charts shown in Sections C1 through C14

include all of the employees of the companies before their merger. If there are any other employees which are not included, please indicate their pre-merger and post-merger numbers by business unit.

- AG-1-19 Referring to page 17 of the Merger Savings Report, please provide the annual cost of lockboxes for each of the years 1997 through 2003.
- AG-1-20 Please indicate when the Company first began using the Peoplesoft software. Please also provide the annual cost of the Peoplesoft software for each of the years 1997 through 2003.
- AG-1-21 Referring to page 24 of the Merger Savings Report, please provide the job titles, functions, and responsibilities of each of the nine employees in the group G9 – Other.
- AG-1-22 Referring to page 33 of the Merger Savings Report, please provide the number of employees in each distribution function indicated on that page for each of the companies for each of the years 1999 through 2003.
- AG-1-23 Referring to page 34 of the Merger Savings Report, please provide the annual cost of environmental testing performed by third-party laboratories for each of the years 1997 through 2003.
- AG-1-24 Referring to page 44 of the Merger Savings Report, please reconcile the Actual 2001 and 2002 Total Benefits Costs – O&M with the respective amounts shown on the companies' Annual Returns to the Department.
- AG-1-25 Referring to page 46 of the Merger Savings Report, please provide a complete and detailed description of the insurance coverage provided under each of the types of insurance provided before and after the merger, including the liability coverage, and the deductibles.
- AG-1-26 Referring to page 47 of the Merger Savings Report, please provide the types of Information Systems software being used by each of the companies before the merger in each of the areas indicated on that page (e.g. Customer Support, Supply Chain, etc.).
- AG-1-27 Referring to page 54 of the Merger Savings Report, please provide the following information for each of the facilities indicated:
- (1) a complete and detailed description of the pre-merger use (if any) of the facility;
 - (2) a complete and detailed description of the current use (if any) of the

- facility;
- (3) a complete and detailed description of the ownership or ownership rights;
- (4) an indication as to whether the Company believes that the property is needed anymore for utility purposes;
- (5) the workpapers, calculations, formulas, assumptions, and supporting documentation for the actual savings amounts shown; and
- (6) the current book value of the property or the annual lease expense as applicable.

AG-1-28 Referring to page 56 of the Merger Savings Report, please indicate whether the Company provides Proxy Statements anymore, and if not, why not.

AG-1-29 Referring to page 56 of the Merger Savings Report, please indicate whether the Company incurs Stock Exchange fees anymore, and if not, why not.

AG-1-30 Referring to page 73 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the “additional savings in the Default Service and Standard Offer negotiations.”

AG-1-31 Referring to page 73 of the Merger Savings Report, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the load diversity savings dollar amounts. Please also provide a copy of the “proposal by a qualified vendor dated August 29, 2001 for the period January 2002 through December 2002.”

AG-1-32 Please discuss in detail all of the Company’s planned or actual regulatory uses of the Merger Savings Report.

DATED: March 1, 2004